

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

LEHMAN BROTHERS HOLDINGS INC., *et al.*,

Debtors.

Chapter 11

Case No. 08-13555 (SCC)

CERTIFICATE OF NO OBJECTION

I, Joshua M. Slocum, of full age, hereby certify as follows:

I am Counsel with the law firm of Wollmuth Maher & Deutsch LLP, 500 Fifth Avenue, New York, New York 10110, attorneys for the Plan Administrator, Lehman Brothers Holdings Inc. (“LBHI”), and am not a party to this action.

On May 12, 2020, LBHI filed a Motion in Aid of Alternative Dispute Resolution Procedures Order for Indemnification Claims of the Debtors Against Mortgage Loan Sellers [Dkt. No. 60632] (the “Motion”). The Motion was made returnable July 14, 2020. On May 12, 2020, LBHI served the Motion on the potential successors (“Successors”) listed in Exhibit A to the Motion by first class U.S. mail, and caused an affidavit of service to be filed on May 14, 2020. [Dkt. No. 60638].

According to Rule 9006-1 of the Local Bankruptcy Rules for the Southern District of New York (the “Local Rules”), “[w]here service is made at least fourteen (14) days before the return date, any answering papers shall be served so as to ensure actual receipt not later than seven (7) days before the return date.” Therefore, a response was due by July 7, 2020.

Over 48 hours have elapsed since the deadline for a response, and no objection, responsive pleading, or request for a hearing has been filed or served on LBHI by any of the Successors listed on Exhibit A hereto.¹ Therefore, I am filing this Certificate of No Objection pursuant to Rule 9075-2 of the Local Rules as to these Successors.

¹ Exhibit A includes all potential Successors named in the Motion except those named in the Notice of Adjournment filed by LBHI on July 10, 2020, for whom LBHI has adjourned the hearing until August 18, 2020. *See* Dkt. No. 60729. Exhibit A also omits LoanDepot and The Mortgage Firm, with whom LBHI has reached agreement to settle.

Dated: New York, New York
July 13, 2020

/s/ Joshua M. Slocum

Joshua M. Slocum

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Counsel for Lehman Brothers Holdings Inc.

EXHIBIT A

Successors²
1st Reliant Home Loans, Inc.
Absolute Mortgage, a division of Finance of America Mortgage LLC
AIM Mortgage LLC
Anthem Bank and Trust
BayBurg Financial, Inc.
CenterState Bank of Florida
Commerce Bank a Division of Berkshire Bank
Congressional Bank*
Crosscountry Mortgage* ³
Eagle Bank
Excel Funding Real Estate Services Inc.
Fidelity Home Loans, LLC
First Bank Texas
First Community Bank
Geneva Financial, LLC. d/b/a All In One Mortgage Lenders
HarborOne Mortgage*

² Successors marked with an asterisk (*) were served via first class mail and ECF on their respective counsel.

³ Crosscountry Mortgage's alleged predecessor, Perl Mortgage, Inc., filed an objection to the Motion. [Dkt. No. 60723]. However, Crosscountry Mortgage itself did not object.

Homeward Residential, Inc.*
LendUS*
Liberty Mortgage Lending
LMH Capital
Lund Mortgage Team
MLB Residential Lending LLC
Mortgage Management Consultants, Inc.
Mortgage Master Service Corporation
NationsChoice Mortgage
Ohio Lending Consultants, LLC.
Old National Bancorp
Pinnacle Financial Partners
Polaris Home Funding Corp.
Premier Choice Funding
Prosperity Home Mortgage, LLC
RaboBank National Association
Regency Centers Corporation
Senior Lending Corporation
Silver Lining Funding
Skyline Home Loans d/b/a New Leaf Lending, a division of Skyline Financial Corporation

South Wind Financial, Inc.
Southern Mortgage Corp.
Synergy One Lending
United Bankshares
United Guaranteed Mortgage Company
Urban Financial of America, LLC
Washington First Mortgage Loan Corp.
Whitney Bank